

Exhibit E

TIME RECORDS ARRANGED BY TASK

Summary of Time1

Time Attributable to Specific Tasks2

1. Investigation & Complaint2

2. Case Management6

3. Rule 12 Briefing8

4. Written Discovery11

5. Document Review & Deposition Preparation.....19

6. Discovery Motion Practice.....24

7. Expert Discovery28

8. Motion for Partial Summary Judgment.....29

9. Mediation & Settlement31

Summary of Time

Task	Biller (Timekeeper)						%
	TAC	JF	TMF	MRP	PKJ	Total	
Investigation & Complaint	2.7	15.6	-	-	39.1	57.4	6.8%
Case Management	2.1	16.2	0.5	-	2.7	21.5	2.5%
Rule 12 Briefing	11.0	21.3	15.9	0.3	58.0	106.5	12.6%
Written Discovery	3.0	66.5	19.9	38.3	16.4	144.1	17.1%
Document Review & Deposition Preparation	3.2	164.7	24.9	3.5	112.4	308.7	36.5%
Discovery Motion Practice	0.5	29.2	-	8.0	18.0	55.7	6.6%
Expert Discovery	-	2.0	-	-	5.8	7.8	0.9%
Motion for Partial Summary Judgment	-	27.9	3.1	2.6	9.8	43.4	5.1%
Mediation & Settlement	10.5	24.8	-	-	64.4	99.7	11.8%
Totals =	33.0	368.2	64.3	52.7	326.6	<u>844.8</u>	
% =	3.9%	43.6%	7.6%	6.2%	38.7%		

*Time Attributable to Specific Tasks***1. Investigation & Complaint**

Biller	Date	Description (Investigation & Complaint)	Hours
PKJ	10/5/2015	Confidential client communication.	0.2
PKJ	10/13/2015	Confidential client communication.	0.2
PKJ	10/14/2015	Confidential client communication.	1.6
PKJ	10/14/2015	Review scientific studies to incorporate into the complaint.	0.9
PKJ	10/15/2015	Review scientific studies to incorporate into the complaint.	0.8
PKJ	10/15/2015	Draft Complaint – researching information regarding defendant entity, Nutiva, the coconut oil products it has sold, and the representations it has makes regarding its coconut oils.	0.8
PKJ	10/20/2015	Confidential client communication.	1.4
PKJ	10/21/2015	Confidential client communication.	0.9
PKJ	10/22/2015	Confidential client communication.	0.3
PKJ	10/25/2015	Research and read studies and articles regarding negative health effects of saturated fat for incorporation into complaint.	1.4
PKJ	10/26/2015	Draft Complaint allegations related to health effects of saturated fat.	2.7
PKJ	10/27/2015	Draft Complaint allegations on scientific studies regarding coconut oil and CVD; begin drafting sections.	4.0
PKJ	10/29/2015	Continue drafting portions of complaint related to health effects of coconut oil.	4.6
PKJ	10/31/2015	Research violations of Cal. Sherman Law and federal nutrient content claims regulations.	0.9
PKJ	10/31/2015	Draft Complaint allegations regarding misbranding claims.	0.4

Billor	Date	Description (Investigation & Complaint)	Hours
PKJ	11/1/2015	Continue to draft Complaint allegations regarding misbranding claims.	2.2
PKJ	11/2/2015	Draft Complaint allegations regarding misleading nature of Nutiva's labeling, including research on Extra Virgin, Virgin, and Refined products.	4.6
PKJ	11/3/2015	Edit Complaint.	0.6
JF	11/23/2015	Review and revise draft Complaint and send comments to Mr. Joseph.	1.3
TAC	12/2/2015	Review selected parts of resource materials regarding fats and coconut oil.	0.4
TAC	12/2/2015	Teleconference with co-counsel regarding draft Complaint.	0.4
JF	12/2/2015	Call with Mr. Joseph and Mr. Canova regarding draft Complaint.	0.4
PKJ	12/2/2015	Call with Mr. Fitzgerald and Mr. Canova regarding draft Complaint.	0.4
PKJ	12/2/2015	Edit Complaint based on conference with co-counsel.	0.1
PKJ	12/6/2015	Continue to edit Complaint.	0.3
PKJ	12/8/2015	Continue to edit Complaint.	1.2
TAC	12/11/2015	Review of Mr. Joseph's email with alternative drafts of pleading statutory violations; preparation of reply email regarding same.	0.3
PKJ	12/16/2015	Research health effects of replacing saturated fats with unsaturated fats and polyunsaturated fats.	0.4
PKJ	12/16/2015	Additional research on previous versions of labels.	0.4
JF	12/21/2015	Review latest Complaint draft and begin revising.	3.5
JF	12/22/2015	Continue revising Complaint and send revised draft to Mr. Joseph for review.	4.0
PKJ	1/5/2016	Edit Complaint.	0.6
PKJ	1/6/2016	Confidential client communication.	0.1

Biller	Date	Description (Investigation & Complaint)	Hours
PKJ	1/6/2016	Draft CLRA venue affidavit.	0.2
PKJ	1/6/2016	Review and edit Complaint; send to client for review.	1.3
PKJ	1/7/2016	Final Review of Complaint.	0.3
JF	1/13/2016	Email and telephone communications with Rakesh Amin, counsel for Nutiva, regarding service of Complaint and related documents.	0.5
TAC	2/11/2016	Review of Answer to Removal Complaint; review website and research regarding defendant's additional new counsel; related email to Messrs. Fitzgerald and Joseph, and Ms. Persinger.	0.5
PKJ	10/6/2016	Confidential client communication.	0.3
JF	10/13/2016	Call with Shirin Delalat; prepare and send Ms. Delalat engagement letter; draft and prepare for sending CLRA letter on behalf of Ms. Delalat; send same to Matt Orr with request for stipulation to amend complaint; begin drafting First Amended Complaint.	2.2
TAC	11/11/2016	Teleconference with Mr. Fitzgerald and Mr. Joseph regarding first amended complaint.	0.2
JF	11/11/2016	Call with Mr. Joseph and Mr. Canova to discuss strategy for amending complaint.	0.2
PKJ	11/11/2016	Call with Mr. Fitzgerald and Mr. Canova regarding first amended complaint.	0.2
PKJ	11/11/2016	Confidential client communications.	0.5
PKJ	11/11/2016	Amend Complaint.	1.8
PKJ	11/12/2016	Amend Complaint.	0.2
PKJ	11/14/2016	Amend Complaint.	1.4
PKJ	11/14/2016	Confidential client communication.	0.2
PKJ	11/21/2016	Confidential client communication.	0.1
PKJ	11/22/2016	Confidential client communication.	0.2

Biller	Date	Description (Investigation & Complaint)	Hours
TAC	12/1/2016	Conference with Mr. Fitzgerald and co-counsel regarding status of additional plaintiffs for amended complaint.	0.3
JF	12/1/2016	Strategy call with Mr. Canova and Mr. Joseph.	0.3
JF	12/1/2016	Call with client Shirin Delalat; finalize First Amended Complaint and send to Ms. Delalat for review.	2.2
PKJ	12/1/2016	Discuss case strategy with Mr. Fitzgerald and Mr. Canova.	0.3
TAC	12/2/2016	Confer with Mr. Fitzgerald regarding draft amended complaint; review draft amended complaint and related emails to client and Nutiva's counsel; confer with Mr. Fitzgerald regarding email from Nutiva counsel regarding whether Nutiva will consent to the filing of an amended complaint.	0.6
JF	12/2/2016	Telephone call with Matt Orr to discuss stipulation to amend Complaint; internal and external communications regarding same.	0.2
JF	12/5/2016	Call to client Shirin Delalat regarding First Amended Complaint; discussions with Mr. Joseph regarding same; finalize and file First Amended Complaint.	0.8
PKJ	12/5/2016	Call with Mr. Fitzgerald regarding Shirin Delalat.	0.1
Total =			57.4

2. Case Management

Billor	Date	Description (Case Management)	Hours
PKJ	10/22/2015	Draft CLRA demand letter.	0.7
JF	10/30/2015	Review and revise CLRA demand letter.	0.2
TAC	11/23/2015	Review of Nutiva's letter response to CLRA letter; research regarding opposing counsel.	0.3
TAC	11/25/2015	Confer with Mr. Fitzgerald regarding Nutiva's letter; review Nutiva website; teleconference with Mr. Fitzgerald regarding same and timing of filing.	0.5
JF	11/25/2015	Confer with Mr. Canova regarding Nutiva's letter and timing of filing complaint.	0.5
PKJ	12/5/2015	Review correspondence from Nutiva's counsel and outline response.	0.3
PKJ	2/11/2016	Review Case Scheduling Order and Removal Documents filed by Nutiva.	0.5
JF	2/16/2016	Call Nutiva's counsel for introduction and leave voicemail.	0.1
TAC	2/17/2016	Review email from Mr. Flynn with bio information for assigned judge; reply email to Messrs. Flynn and Fitzgerald regarding same.	0.3
PKJ	2/19/2016	Review ECF updates and attached documents: judge reassignment (16), case management conference date (17), order of recusal (13).	0.2
TAC	3/1/2016	Review of email from Mr. Fitzgerald regarding participants for Rule 26(f) conference of counsel; review of bios for same.	0.3
TAC	3/20/2016	Emails to Mr. Joseph regarding Nutiva Virgin and Extra Virgin product claims.	0.2
PKJ	9/24/2016	Confidential client communication.	0.2
JF	10/3/2016	Prepare for Initial Case Management conference; travel to San Francisco for initial CMC.	7.8

Biller	Date	Description (Case Management)	Hours
JF	10/4/2016	Participate in Initial Case Management Conference and travel home.	5.8
JF	10/5/2016	Draft stipulated proposed scheduling order and related proposed order and send to Mr. Joseph for review; circulate same to opposing counsel for review.	0.9
JF	10/5/2016	Review stipulated scheduling order and proposed order; call with Mr. Joseph to discuss same.	0.3
PKJ	10/5/2016	Review stipulated scheduling order and proposed order.	0.2
PKJ	10/5/2016	Call with Mr. Fitzgerald to discuss stipulated scheduling order and proposed order.	0.1
JF	10/7/2016	Communications and negotiations with opposing counsel regarding scheduling stipulation; finalize and file same.	0.1
TAC	10/12/2016	Review transcript of Case Management Conference.	0.2
TMF	10/13/2016	Draft CLRA letter for plaintiff Shirin Delalat regarding her purchase of Extra Virgin and Refined Coconut Oils.	0.5
TAC	10/20/2016	Teleconference with Mr. Fitzgerald and Mr. Joseph regarding case management issues.	0.3
JF	10/20/2016	Teleconference with Mr. Canova and Mr. Joseph regarding case management.	0.3
PKJ	10/20/2016	Call with Mr. Fitzgerald and Mr. Canova regarding case management issues.	0.3
JF	10/28/2016	Call with Mr. Joseph and Mr. Canova regarding mediation and discovery.	0.2
PKJ	10/28/2016	Call with Mr. Fitzgerald and Mr. Canova to discuss potential mediation and ongoing discovery issues.	0.2
Total =			21.5

3. Rule 12 Briefing

Biller	Date	Description (Rule 12 Briefing)	Hours
JF	3/8/2016	Review Nutiva's motion for judgment on the pleadings.	0.4
JF	3/9/2016	Discussions with Mr. Joseph regarding Nutiva's motion for judgment on the pleadings and strategy regarding injunctive relief claims; undertake research regarding remand of injunctive relief claims and begin drafting motion seeking same.	3.1
PKJ	3/9/2016	Review Nutiva's motion for judgment on the pleadings and outlining opposition arguments; call with Mr. Fitzgerald regarding same.	0.9
PKJ	3/9/2016	Review and edit draft of motion to remand claims for injunctive relief.	0.3
PKJ	3/9/2016	Research for opposition to Nutiva's motion for judgment on the pleadings, including Article III standing for injunctive relief in false advertising cases and plaintiff's ability to bring claims for products not purchased.	2.8
PKJ	3/9/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	3.1
TAC	3/10/2016	Review of Nutiva Motion for Judgment on Pleadings.	0.5
PKJ	3/10/2016	Research for opposition to Nutiva's motion for judgment on the pleadings, including review of case law regarding unlawful misbranding claims.	4.8
PKJ	3/10/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	0.6
JF	3/11/2016	Complete first draft of motion to remand including drafting proposed order, and send to Mr. Canova and Mr. Joseph for review; review and incorporate Mr. Joseph's comments.	0.5
PKJ	3/11/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	5.8

Biller	Date	Description (Rule 12 Briefing)	Hours
PKJ	3/11/2016	Edit motion to remand claims for injunctive relief.	4.0
PKJ	3/12/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	0.5
PKJ	3/13/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	4.4
PKJ	3/14/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	6.2
PKJ	3/15/2016	Draft plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	5.9
PKJ	3/15/2016	Draft request for judicial notice.	0.4
PKJ	3/16/2016	Edit plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	3.2
JF	3/18/2016	Begin reviewing and revising draft opposition to motion for judgment on the pleadings.	2.5
JF	3/19/2016	Continue revising draft opposition to motion for judgment on the pleadings.	1.7
TAC	3/20/2016	Revise draft opposition to Nutiva's motion for judgment on the pleadings.	2.0
TAC	3/22/2016	Further revisions to draft Opposition to Nutiva MTD; related emails with Mr. Joseph and teleconference with Messrs. Fitzgerald and Joseph.	1.5
JF	3/22/2016	Call with Mr. Joseph regarding status of opposition to motion for judgment on the pleadings; review, revise, finalize, and file opposition to motion for judgement on the pleadings and related Request for Judicial Notice.	3.3
PKJ	3/22/2016	Draft supporting declaration and prepare exhibits for plaintiff's opposition to Nutiva's motion for judgment on the pleadings	0.7
PKJ	3/22/2016	Call with co-counsel Mr. Fitzgerald concerning final tasks to file opposition to Nutiva's motion for judgment on the pleadings	0.2

Billor	Date	Description (Rule 12 Briefing)	Hours
PKJ	3/22/2016	Research supplemental jurisdiction over injunctive relief claims and draft argument regarding same in plaintiff's opposition to Nutiva's motion for judgment on the pleadings.	1.5
PKJ	3/22/2016	Edit opposition to Nutiva's motion for judgment on the pleadings to hit page limit.	2.2
PKJ	3/22/2016	Draft proposed order granting request for judicial notice.	0.5
TMF	3/23/2016	Draft motion to strike affirmative defenses.	8.3
TAC	3/24/2016	Revise plaintiff's motion to strike affirmative defenses, and proposed order.	1.0
JF	3/24/2016	Review and revise draft Motion to Strike Affirmative Defenses; complete and file same.	3.0
TMF	3/24/2016	Continue work on motion to strike affirmative defenses; draft proposed order, and file.	2.3
PKJ	4/1/2016	Review Nutiva's opposition to plaintiff's motion to remand claims for injunctive relief and begin draft of reply in support of motion.	4.7
PKJ	4/3/2016	Draft reply in support of plaintiff's motion to remand claims for injunctive relief.	0.6
PKJ	4/4/2016	Draft reply in support of plaintiff's motion to remand claims for injunctive relief.	0.5
TAC	4/5/2016	Review and revise draft Reply in support of Motion for Remand of Injunctive Relief Claims;	6.0
TMF	4/11/2016	Draft reply in support of motion to strike affirmative defenses; circulate to Mr. Fitzgerald and Mr. Canova for review.	5.3
PKJ	4/13/2016	Review Nutiva's reply in support of motion for judgment on the pleadings.	0.4
PKJ	4/13/2016	Draft and edit reply in support of motion to strike Nutiva's affirmative defenses.	2.8

Biller	Date	Description (Rule 12 Briefing)	Hours
JF	4/14/2016	Review, revise, finalize, and file Reply in Support of Motion to Strike Affirmative Defenses.	1.7
JF	4/26/2016	Prepare for Rule 12 motion hearing (prior to order vacating hearing).	4.2
PKJ	6/9/2016	Draft notice of authority regarding Costco decision and file with court.	0.3
JF	6/11/2016	Prepare and file Statement of Recent Decision regarding <i>Bishop v. 7-Eleven, Inc.</i>	0.3
JF	8/12/2016	Prepare and file Statement of Recent Decision regarding <i>Hunter v. Nature's Way</i> .	0.2
PKJ	8/12/2016	Review decisions noticed by Nutiva on 8/11/2016: <i>Parent v. Millercoors</i> and <i>Strumlauf v. Starbucks</i>	0.3
JF	9/22/2016	Review Judge Gilliam's Order on Nutiva's Motion for Judgment on the Pleadings.	0.4
MRP	9/22/2016	Review order granting in part and denying in part motion for judgment on the pleadings, denying motion to remand, and denying motion to strike.	0.3
PKJ	9/22/2016	Read Judge Gilliam's order on motions for Judgment on Pleadings and to Strike defenses.	0.4
Total =			106.5

4. Written Discovery

Biller	Date	Description (Written Discovery)	Hours
TMF	2/26/2016	Begin drafting first discovery requests.	0.5
JF	3/1/2016	Together with Mr. Joseph, participate in call with opposing counsel regarding scheduling of Rule 26(f) conference.	0.1
PKJ	3/1/2016	Call with Mr. Fitzgerald to defense counsel to arrange 26(f) conference.	0.1
PKJ	3/1/2016	Draft plaintiff's first set of Requests for Production.	3.5

Biller	Date	Description (Written Discovery)	Hours
PKJ	3/1/2016	Draft plaintiff's first set of Interrogatories.	0.4
PKJ	3/2/2016	Draft plaintiff's first set of Interrogatories.	0.6
PKJ	3/2/2016	Draft initial joint 26(f) report to send to Nutiva in preparation for conference.	1.0
PKJ	3/3/2016	Draft plaintiff's initial discovery disclosures.	0.5
TAC	3/9/2016	Review emails from Nutiva's counsel; conference with Mr. Fitzgerald and co-counsel regarding rule 26(f) conference.	0.5
JF	3/9/2016	Conference call with Mr. Canova and co-counsel, Mr. Joseph discussing 26(f) report.	0.3
PKJ	3/9/2016	Call with Mr. Fitzgerald and Mr. Canova regarding 26(f) report.	0.3
JF	3/9/2016	Communications with opposing counsel regarding rescheduling of Rule 26(f) conference; review and revise initial disclosures and circulate to co-counsel for review; finalize and serve same; revise draft joint Rule 26(f) report.	3.8
JF	3/19/2016	Review, revise, and draft discovery requests including requests for production, interrogatories, and requests for admission.	3.2
PKJ	3/19/2016	Edit Plaintiff's first set of requests for production, interrogatories, and requests for admission.	0.5
JF	3/21/2016	Revise N.D. Cal. model ESI stipulation and send draft to opposing counsel for review; review, revise, and finalize discovery requests, and serve same on Nutiva.	1.3
PKJ	3/21/2016	Edit plaintiff's first set of requests for admission.	0.3
JF	3/24/2016	Review and revise draft Rule 26(f) report and return to opposing counsel; communications with opposing counsel concerning same, especially regarding stipulation to electronic service.	1.4
JF	3/30/2016	Finalize and file Rule 26(f) report.	0.4

Biller	Date	Description (Written Discovery)	Hours
JF	5/5/2016	Review Nutiva's written discovery objections and responses, and draft email to Nutiva's counsel, Sanjay Karnik regarding the same.	0.8
JF	5/10/2016	Begin drafting meet and confer letter regarding Nutiva's deficient responses to plaintiff's interrogatories, document requests, and requests for admission.	5.5
JF	5/11/2016	Continuing work on meet and confer letter regarding Nutiva's deficient responses to plaintiff's interrogatories, document requests, and requests for admission.	6.5
JF	5/13/2016	Complete meet and confer letter and circulate to Mr. Joseph for review; send letter to opposing counsel.	7.3
TMF	5/13/2016	Edit meet and confer letter regarding initial discovery requests, including legal research.	2.4
MRP	5/23/2016	Draft third party subpoenas.	0.5
MRP	5/26/2016	Finish drafts of third party subpoenas; circulate drafts for review; correspondence with co-counsel regarding same.	3.9
MRP	5/26/2016	Review letter from Nutiva's counsel regarding discovery requests.	0.2
JF	5/27/2016	Respond to email from Nutiva's counsel regarding discovery issues and request to engage in meet and confer conference.	0.7
JF	5/27/2016	Telephone call with Liz Kaplan, former Nutiva employee; review and revise draft of third-party subpoena to BuzzBack; draft subpoena to Liz Kaplan and send to AMS for service; draft Notice of Intent to Serve subpoena on Ms. Kaplan.	1.0
MRP	5/27/2016	Review correspondence regarding Nutiva's discovery responses; review correspondence regarding third party subpoenas; edits to third party subpoenas and circulate same for review.	1.6

Biller	Date	Description (Written Discovery)	Hours
JF	5/31/2016	Meet with Melanie Persinger to discuss draft subpoenas and further edits; review Ms. Persinger's drafts, revise, finalize, and send to AMS for service; draft and send notice of intent to serve subpoenas on Nutiva.	3.9
MRP	5/31/2016	Continue work on third party subpoenas.	1.9
PKJ	6/5/2016	Revise discovery letter and prepare for meet and confer call.	0.7
JF	6/6/2016	Call with Carol Fitzgerald (BuzzBack CEO) regarding subpoena to BuzzBack.	0.3
JF	6/6/2016	Call with Mr. Joseph to prepare for meet and confer call with Nutiva; meet and confer conference with Nutiva's counsel, Sanjay Karnik and Matt Orr; draft email to Nutiva regarding agreements reached during meet and confer conference.	4.4
PKJ	6/6/2016	Call to prepare for meet and confer with Mr. Fitzgerald.	1.1
PKJ	6/6/2016	Conduct meet and confer regarding plaintiff's first set of discovery requests and defendant's objections thereto.	1.9
JF	6/10/2016	Draft status table regarding Nutiva document subpoenas and circulate to Mr. Joseph for review.	0.4
JF	6/13/2016	Prepare for follow-up meet-and-confer conference; together with Mr. Joseph, participate in meet-and-confer call with Matt Orr and Sanjay Karnik; email communications following conference.	1.1
PKJ	6/13/2016	Meet and confer call with co-counsel Mr. Fitzgerald and opposing counsel Sanjay Karnik and Matt Orr.	0.5
JF	6/14/2016	Tasks relating to third-party discovery, including and call with Super Natural distributors; update document subpoena status table and send to Mr. Joseph.	0.5

Biller	Date	Description (Written Discovery)	Hours
PKJ	6/14/2016	Draft list of discovery search terms.	1.8
PKJ	6/15/2016	Compile list of discovery issues to address.	0.3
JF	6/16/2016	Start reviewing Mr. Joseph's notes regarding potential custodians and search terms.	0.2
JF	6/17/2016	Using Mr. Joseph's notes, draft list of proposed custodians and search terms, and send to Mr. Joseph for review.	0.5
PKJ	6/17/2016	Edit search terms list.	0.2
JF	6/20/2016	Finalize and send list of proposed custodians and search terms to Nutiva; review response of United Natural Foods, Inc. to subpoena, including communications regarding downloading production; review response of Super Natural Foods to subpoena; update table regarding status of document subpoenas and send to Mr. Joseph.	0.8
JF	6/24/2016	Telephone call with UNFI IT person Aaron Chea; revise table of document subpoena status.	0.6
PKJ	6/24/2016	Review Nutiva's supplemental responses to plaintiff's first set of requests for admission.	0.1
JF	7/6/2016	Review emails from Sanjay Karnik and Matt Orr regarding updated discovery responses; send email to Mr. Canova and Mr. Joseph regarding same.	0.1
JF	7/11/2016	Participate in meet-and-confer telephone call with Sanjay Karnik and Matt Orr regarding proposed custodians and keyword search terms.	0.8
JF	7/11/2016	Revise Kaplan subpoena and Blomquist deposition notice and serve same on Nutiva's counsel.	0.2
JF	7/12/2016	Revise proposed custodian and keyword search term lists to reflect agreements reached during meet-and-confer call, and send to opposing counsel to confirm substance of meet-and-confer.	1.0

Biller	Date	Description (Written Discovery)	Hours
JF	7/14/2016	Communications with Nutiva's counsel concerning discovery issues and Nutiva's initial disclosures.	0.8
MRP	8/2/2016	Review deposition transcript from the deposition of Neil Blomquist; draft new discovery requests based on information disclosed by Mr. Blomquist.	3.5
MRP	8/3/2016	Finish drafting requests for production; correspondence with Mr. Fitzgerald regarding the same; compile list of potential custodians based on information disclosed during depositions; begin draft of requests for admission.	5.0
MRP	8/4/2016	Finish draft of requests for admission and send to Mr. Fitzgerald for review.	2.0
MRP	8/4/2016	Edit discovery requests; correspondence with co-counsel regarding same.	0.2
TMF	8/5/2016	Review Liz Kaplan's deposition transcript; incorporate information into document requests and requests for admission, and identify potential new custodians of information.	4.6
TMF	8/8/2016	Continue work on Liz Kaplan deposition review and drafting of discovery requests based thereon.	3.2
JF	9/1/2016	Begin reviewing and revising draft second document requests to Nutiva.	0.5
JF	9/2/2016	Continue reviewing and revising second discovery requests to Nutiva, including requests for production and requests to admit; begin draft second set of interrogatories to Nutiva.	4.5
JF	9/5/2016	Complete drafts of second discovery requests and send to Mr. Joseph for review.	4.5
PKJ	9/6/2016	Review and edit plaintiff's second set of discovery requests to Nutiva.	1.1
TMF	9/8/2016	Finalize discovery requests and serve on Nutiva.	1.2

Biller	Date	Description (Written Discovery)	Hours
JF	9/23/2016	Revise Rule 26(f) report in light of Judge Gilliam's September 22 Order and send to Mr. Joseph for review.	1.6
JF	9/26/2016	Send updated joint Rule 26(f) report to Nutiva's counsel and, together with Mr. Joseph, participate in further Rule 26(f) meet and confer call with Nutiva's counsel Sanjay Karnik and Matt Orr.	0.8
PKJ	9/26/2016	Participate in 26(f) and discovery plan conference with opposing counsel and review draft report.	0.4
JF	9/27/2016	Review and revise updated Joint Rule 26(f) report and send to Mr. Joseph for review.	0.7
JF	9/28/2016	Review Mr. Joseph's revisions to updated Rule 26(f) report, make additional revisions, and send to Nutiva for further review and revision.	0.4
PKJ	9/28/2016	Review and edit revised 26(f) report.	0.4
JF	9/30/2016	Revise updated joint Rule 26(f) report to include information required under Local Rule 16-9; finalize and file after opposing counsel's review and authorization.	1.6
PKJ	10/10/2016	Review discovery requests to Nutiva to determine which requests plaintiff is entitled to discovery on regarding Extra Virgin and Refined Coconut Oils.	0.3
PKJ	10/10/2016	Email Mr. Karnik regarding production of Extra Virgin and Refined Coconut Oil labels.	0.1
JF	10/14/2016	Review Nutiva's responses to second set of discovery requests.	0.4
JF	10/17/2016	Begin working on letter concerning Nutiva's deficient responses to second set of discovery requests.	1.7
JF	10/18/2016	Work on letter regarding deficient responses to second discovery requests.	0.8
JF	10/20/2016	Review and catalog discovery status (i.e., which Nutiva custodians have produced documents).	0.9

Biller	Date	Description (Written Discovery)	Hours
TAC	10/21/2016	Revisions to draft meet and confer letter to Nutiva counsel re supplementing prior discovery responses, producing insurance policy, and insufficient responses to second set of discovery.	2.5
JF	10/25/2016	Download new documents, update discovery status table and send to Mr. Joseph.	0.2
MRP	11/28/2016	Draft third party subpoenas and document requests.	3.0
MRP	11/29/2016	Draft an additional subpoena; finalize all subpoenas; draft notice of intent to serve subpoenas; serve notice of intent to serve subpoenas on opposing counsel.	1.9
PKJ	12/12/2016	Research regarding address for Addis Group subpoena.	0.2
PKJ	12/16/2016	Call third party Presence Marketing regarding subpoena.	0.1
TMF	3/1/2017	Draft discovery responses to Nutiva's requests for admission to Shirin Delalat.	4.0
TMF	3/2/2017	Complete initial draft of responses to Nutiva's requests for admission to Shirin Delalat.	4.0
MRP	3/7/2017	Draft responses and objections to first set of requests for production to plaintiff Shirin Delalat.	7.0
MRP	3/8/2017	Continue drafting responses and objections to first set of requests for production to plaintiff Shirin Delalat.	5.8
MRP	3/10/2017	Finish initial draft of responses and objections to first set of requests for production to plaintiff Shirin Delalat.	1.8
Total =			144.1

5. Document Review & Deposition Preparation

Billor	Date	Description (Doc. Review & Deposition Prep.)	Hours
PKJ	5/9/2016	Review and catalog document production.	2.6
PKJ	5/10/2016	Review and catalog document production.	3.2
PKJ	5/11/2016	Review and catalog document production.	3.4
PKJ	5/16/2016	Review and catalog document production.	0.5
PKJ	5/17/2016	Draft notices of deposition for Elizabeth Kaplan and Neil Blomquist.	0.4
TAC	5/30/2016	Finalize Deposition and Document Subpoena for Kaplan (former Nutiva Marketing Manager), and Notice of Intent to Serve.	2.0
JF	6/1/2016	Revise email to Nutiva regarding Neil Blomquist deposition.	0.5
PKJ	6/1/2016	Prepare for deposition of Neil Blomquist.	1.1
PKJ	6/1/2016	Email opposing counsel regarding depositions and scheduling.	0.3
JF	6/2/2016	Review and revise Mr. Joseph's draft email to opposing counsel concerning Kaplan and Blomquist depositions; telephone call with Mr. Joseph concerning the same.	0.7
PKJ	6/2/2016	Prepare for deposition of Neil Blomquist.	2.7
PKJ	6/2/2016	Email opposing counsel regarding deposition and scheduling.	0.6
PKJ	6/2/2016	Call with Mr. Fitzgerald regarding Blomquist deposition.	0.2
PKJ	6/13/2016	Review Nutiva's amended discovery production.	0.2
PKJ	6/14/2016	Email opposing counsel regarding scheduling of depositions for Liz Kaplan and Neil Blomquist.	0.1
PKJ	6/14/2016	Review production from third party, Total Label.	0.3
PKJ	6/24/2016	Review production from third party, Buzzback.	0.3
PKJ	6/24/2016	Review production from third party, UNFI.	0.8

Biller	Date	Description (Doc. Review & Deposition Prep.)	Hours
JF	7/13/2016	Call with Mr. Joseph to discuss deposition preparation and strategy; begin preparing for Liz Kaplan deposition by reviewing documents thus far produced in the matter.	6.8
PKJ	7/13/2016	Call with Mr. Fitzgerald to discuss deposition preparation and strategy.	0.3
JF	7/14/2016	Complete document review, including KeHe and UNFI documents and further prepare for Liz Kaplan deposition.	9.2
PKJ	7/15/2016	Review production from third party, KEHE.	0.8
PKJ	7/16/2016	Prepare for deposition of Neil Blomquist.	3.4
JF	7/17/2016	Meet with Paul Joseph to discuss Nutiva deposition strategy, overall case strategy, and key documents; continue preparing for Liz Kaplan deposition.	7.1
PKJ	7/17/2016	Prepare for depositions with Mr. Fitzgerald.	5.1
JF	7/18/2016	Continue to prepare for deposition of Marketing Manager Liz Kaplan.	9.7
MRP	7/18/2016	Create label chart to track timing of label and claim changes.	2.5
PKJ	7/18/2016	Prepare for deposition of Neil Blomquist.	8.2
JF	7/19/2016	Continue to prepare for deposition of Marketing Manager Liz Kaplan.	5.8
PKJ	7/19/2016	Prepare for deposition of Neil Blomquist.	7.4
JF	7/20/2016	Travel to Oakland for depositions, and work on preparation with Mr. Joseph.	5.0
MRP	7/20/2016	Continue to draft label chart.	1.0
PKJ	7/20/2016	Travel to Oakland for depositions.	2.3
PKJ	7/20/2016	Prepare for depositions.	3.8
JF	7/21/2016	Second chair deposition of Neil Blomquist.	6.5
PKJ	7/21/2016	Finish preparing and depose Neil Blomquist.	7.6

Billor	Date	Description (Doc. Review & Deposition Prep.)	Hours
JF	7/22/2016	Take deposition of Liz Kaplan; travel back to San Diego.	13.2
PKJ	7/22/2016	Second Chair deposition of Elizabeth Kaplan; return travel to San Diego.	12.9
PKJ	7/29/2016	Review July 18, 2016 Nutiva production.	0.1
PKJ	7/29/2016	Review production from Liz Kaplan.	0.9
PKJ	9/4/2016	Review production of John Roulac emails.	2.9
PKJ	9/11/2016	Review documents produced by Nutiva (NUT3613 -NUT4081).	1.7
TMF	9/16/2016	Perform document review; research on discovery issues.	1.2
PKJ	10/5/2016	Review production of Folena-Spellman emails.	1.1
PKJ	10/7/2016	Review production sent by Mr. Karnik.	0.3
TMF	10/11/2016	Continue to perform document review, including indexing Nutiva's production.	7.4
TMF	10/31/2016	Perform further document review, including indexing Nutiva's production.	4.3
TMF	11/1/2016	Perform further document review, including indexing Nutiva's production.	5.5
PKJ	11/21/2016	Draft 30(b)(6) deposition notice.	2.7
TMF	11/22/2016	Update production folder to include Nutiva's recent document productions, including preparing them for combination and review; conduct further document review and indexing.	4.3
TMF	11/23/2016	Continue document review and indexing of production.	2.2
PKJ	11/23/2016	Draft 30(b)(6) deposition notice and outline for deposition.	0.9
PKJ	11/25/2016	Review Nutiva production (NUT5761-NUT6707).	1.2
JF	11/28/2016	Review and revise Mr. Joseph's draft Deposition Notice to Nutiva.	2.6

Biller	Date	Description (Doc. Review & Deposition Prep.)	Hours
JF	12/8/2016	Email to Nutiva's counsel regarding Rule 30(b)(6) deposition scheduling.	0.1
JF	12/12/2016	Update subpoena status and send updated document to Mr. Joseph.	0.1
JF	12/12/2016	Discuss discovery strategy with Mr. Joseph.	0.1
PKJ	12/12/2016	Call with Mr. Fitzgerald regarding discovery.	0.1
PKJ	12/15/2016	Edit 30(b)(6) deposition notice.	0.2
PKJ	1/18/2017	Review materials produced by third party, Presence Marketing.	0.1
PKJ	2/7/2017	Call with Mr. Karnik; email opposing counsel regarding scheduling for 30(b)(6) deposition.	0.2
JF	3/6/2017	Begin preparing for Nutiva's Rule 30(b)(6) deposition.	0.5
JF	3/7/2017	Work on Rule 30(b)(6) deposition preparation and drafting amended notice of deposition.	1.9
JF	3/8/2017	Meet with Mr. Joseph to strategize about case and Rule 30(b)(6) deposition, including analyzing sales of relevant products.	7.8
PKJ	3/8/2017	Prepare for 30(b)(6) deposition and case strategy meeting with Mr. Fitzgerald.	7.8
JF	3/9/2017	Work on preparing for Rule 30(b)(6) deposition.	2.1
JF	3/12/2017	Work on preparing for Rule 30(b)(6) deposition.	6
JF	3/13/2017	Work on preparing for Rule 30(b)(6) deposition.	5.5
TAC	3/14/2017	Confer with Mr. Fitzgerald and Mr. Joseph regarding discovery dispute over 30(b)(6) deposition topics.	0.2
JF	3/14/2017	Continue preparing for Rule 30(b)(6) deposition; review Nutiva's purported objections to deposition notice and discuss same with Mr. Canova and Mr. Joseph; draft email to Nutiva's counsel regarding same.	5.0

Biller	Date	Description (Doc. Review & Deposition Prep.)	Hours
PKJ	3/14/2017	Review Nutiva's objections to plaintiff's deposition notice, discuss with co-counsel, and review and edit email to opposing counsel regarding same.	0.5
TAC	3/15/2017	Teleconference meet and confer with Nutiva counsel, regarding objections to 30(b)(6) deposition topics.	1.0
JF	3/15/2017	Draft Second Amended Deposition Notice and serve on Nutiva; together with Mr. Canova and Mr. Joseph, participate in meet-and-confer call with Sanjay Karnik regarding Nutiva's objections to plaintiffs' Rule 30(b)(6) deposition notice.	1.2
PKJ	3/15/2017	Meet and confer with Mr. Canova, Mr. Fitzgerald, and Mr. Karnik regarding Nutiva's objections to 30(b)(6) deposition notice.	1.0
JF	3/16/2017	Work on preparing for Rule 30(b)(6) deposition.	15.5
JF	3/17/2017	Work on preparing for Rule 30(b)(6) deposition.	8.3
JF	3/18/2017	Continue preparing for Rule 30(b)(6) deposition.	15.0
JF	3/19/2017	Complete preparation for Nutiva 30(b)(6) deposition and travel to San Francisco to take same.	14.5
PKJ	3/19/2017	Assist Mr. Fitzgerald in preparing for 30(b)(6) deposition; travel to San Francisco for deposition.	8.1
JF	3/20/2017	Take Nutiva's 30(b)(6) deposition (John Roulac) and travel home.	14.0
PKJ	3/20/2017	Prepare for and second chair 30(b)(6) deposition and debriefing regarding same; return travel from deposition.	14.1
Total =			308.7

6. Discovery Motion Practice

Biller	Date	Description (Discovery Motion Practice)	Hours
JF	6/3/2016	Begin preparing for meet-and-confer conference regarding discovery; begin drafting joint letter to Court regarding discovery disputes.	4.0
JF	6/4/2016	Complete draft of joint letter motion and send to Mr. Joseph for review.	1.8
PKJ	6/27/2016	Send email to opposing counsel requesting conference call and summarizing issues to discuss.	0.3
JF	6/30/2016	Call with Paul Joseph to prepare for meet and confer conference with opposing counsel.	0.1
JF	6/30/2016	Participate in telephonic meet and confer regarding discovery.	0.3
PKJ	6/30/2016	Call with Mr. Fitzgerald to prepare for meet and confer call.	0.1
PKJ	6/30/2016	Participate in discovery call with Mr. Fitzgerald, Mr. Karnik and Mr. Orr.	0.3
PKJ	7/1/2016	Draft confirmatory email regarding June 30 discovery call and track down information regarding Liz Siemens to provide to Nutiva.	0.3
PKJ	7/26/2016	Review discovery responses and draft letter regarding same.	1.5
PKJ	7/27/2016	Draft letter to court seeking leave to file motion to compel.	2.9
JF	7/29/2016	Review and revise discovery joint letter to Judge Gilliam regarding disputes and request for magistrate to oversee discovery.	1.6
PKJ	7/29/2016	Draft letter to court seeking leave to file motion to compel.	0.7
PKJ	7/30/2016	Review Mr. Fitzgerald's edits to letter to court seeking leave to file motion to compel and requesting assignment to magistrate.	0.2

Biller	Date	Description (Discovery Motion Practice)	Hours
JF	8/1/2016	Finalize and circulate to opposing counsel draft joint letter to Judge Gilliam regarding request to file discovery motion and appoint magistrate judge.	0.4
PKJ	8/8/2016	Review Nutiva's portion of letter to court seeking leave to file motion to compel and requesting assignment to magistrate, edit letter to address issues raised in Nutiva's portion of the letter, and email to counsel for parties.	0.7
JF	8/9/2016	Review and revise joint letter to court regarding discovery disputes.	0.3
PKJ	8/9/2016	Review Nutiva's second round of edits to letter to court seeking leave to file motion to compel and making final edits to plaintiff's portion of the letter.	0.8
PKJ	8/12/2016	Review Order by Judge Kandis A. Westmore terminating 8/10/2016 Joint Discovery Letter.	0.1
PKJ	8/18/2016	Draft revised discovery dispute letter regarding Nutiva's responses to interrogatories per Judge Westmore's Order (Dkt. No. 48).	0.9
PKJ	8/19/2016	Draft revised discovery dispute letter regarding Nutiva's responses to interrogatories per Judge Westmore's Order (Dkt. No. 48).	0.5
PKJ	8/22/2016	Draft revised discovery dispute letter regarding Nutiva's responses to interrogatories per Judge Westmore's Order (Dkt. No. 48).	0.2
MRP	8/23/2016	Draft joint letter regarding compelling further responses to plaintiff's requests for admission.	7.3
MRP	8/24/2016	Edit joint letter regarding compelling further responses to requests for admission; review correspondence regarding discovery letters and attached draft of joint letter regarding Nutiva's responses to plaintiff's interrogatories.	0.5

Biller	Date	Description (Discovery Motion Practice)	Hours
PKJ	8/24/2016	Review revised discovery dispute letter regarding Nutiva's responses to requests for admission per Judge Westmore's order (Dkt. No. 48).	0.2
JF	8/30/2016	Review and begin revising joint letters concerning discovery disputes.	4.4
PKJ	8/31/2016	Draft revised discovery dispute letter regarding Nutiva's responses to requests for production per Judge Westmore's Order (Dkt. No. 48).	1.3
PKJ	9/1/2016	Draft revised discovery dispute letter regarding Nutiva's responses to requests for production per Judge Westmore's Order (Dkt. No. 48).	0.7
PKJ	9/2/2016	Revise discovery dispute letter regarding Nutiva's responses to requests for production per Judge Westmore's Order (Dkt. No. 48).	0.4
JF	9/6/2016	Continue working on draft joint discovery letters.	5.0
JF	9/9/2016	Participate in meet-and-confer telephone call with Sanjay Karnik and Matt Orr regarding current discovery issues, timing of Nutiva production, and joint letters regarding plaintiff's motions to compel.	0.3
PKJ	9/12/2016	Edit joint discovery letters and draft email to Mr. Karnik regarding same.	1.2
JF	9/13/2016	Draft email to Nutiva's counsel regarding issues with document production.	0.2
PKJ	9/14/2016	Review and edit joint discovery letters.	0.6
JF	9/15/2016	Review and further revise joint letters concerning discovery disputes and prepare exhibits; send to Mr. Joseph for review; circulate same to opposing counsel for review.	2.3
JF	9/16/2016	Review, revise, finalize, and file joint letters concerning discovery disputes, including administrative motion.	1.6

Biller	Date	Description (Discovery Motion Practice)	Hours
PKJ	9/22/2016	Read Judge Westmore's Order granting leave to file discovery dispute letter in excess of 5 page limit.	0.1
MRP	9/26/2016	Review court order regarding plaintiff's motion to compel responses to interrogatories 10-11.	0.1
JF	10/7/2016	Review order on motion to compel responses to requests for production 22 and 23.	0.2
MRP	10/7/2016	Review order regarding motion to compel discovery.	0.1
PKJ	10/7/2016	Review order by Judge Westmore on motion to compel requests for production 22-23.	0.1
TAC	10/11/2016	Review Magistrate's Order regarding Motion to Compel Nutiva Responses to Requests for Admission; emails to Messrs. Fitzgerald and Joseph regarding same.	0.5
JF	10/11/2016	Review magistrate judge's ruling on motion to compel responses to requests for admission, and calendar deadlines.	0.3
PKJ	10/11/2016	Review Judge Westmore's order regarding requests for admission, read emails regarding same.	0.2
JF	10/19/2016	Complete draft of meet-and-confer letter regarding Nutiva's deficient responses to plaintiff's second set of discovery requests.	2.0
JF	10/21/2016	Revisions to meet-and-confer letter; send same to Mr. Joseph for review.	0.5
PKJ	10/21/2016	Review and edit discovery letter to Nutiva regarding plaintiff's second set of discovery requests.	0.6
JF	10/24/2016	Review Mr. Joseph's revisions to meet-and-confer letter; draft additional section regarding insurance policy; finalize and send to opposing counsel.	0.6
PKJ	10/28/2016	Reading Nutiva's discovery letter.	0.5

Biller	Date	Description (Discovery Motion Practice)	Hours
JF	11/2/2016	Prepare for and participate in meet and confer conference regarding Nutiva's responses to plaintiff's second set of discovery requests; call with Mr. Joseph to discuss same; draft and send email confirming same.	3.3
PKJ	11/2/2016	Meet and confer call with Mr. Fitzgerald, Mr. Karnik, and Mr. Orr; follow-up call with Mr. Fitzgerald.	2.6
Total =			55.7

7. Expert Discovery

Biller	Date	Description (Expert Discovery)	Hours
JF	11/22/2016	Call with Mr. Joseph to discuss next steps in Dr. Greger report.	0.4
PKJ	11/22/2016	Call with Mr. Fitzgerald regarding strategy for scientific expert report.	0.4
JF	11/23/2016	Telephone call with Mr. Joseph to discuss draft Dr. Greger report and next steps.	0.8
PKJ	11/23/2016	Review materials for expert Dr. Michael Greger sent by Mr. Fitzgerald, and discuss same with Mr. Fitzgerald.	0.9
JF	11/29/2016	Prepare for a call with Dr. Greger to discuss next steps regarding drafting of report.	0.3
JF	11/29/2016	Participate in call with Dr. Greger and Mr. Joseph to discuss next steps regarding drafting of report.	0.3
PKJ	11/29/2016	Call with Dr. Greger and Mr. Fitzgerald.	0.3
PKJ	12/26/2016	Review draft expert report of Dr. Michael Greger.	0.5
PKJ	1/17/2017	Revise draft Dr. Greger report.	3.5
JF	1/25/2017	Together with Mr. Joseph, participate in call with Dr. Greger regarding finalizing report.	0.2

Biller	Date	Description (Expert Discovery)	Hours
PKJ	1/25/2017	Call with Mr. Fitzgerald and expert Dr. Greger.	0.2
Total =			7.8

8. Motion for Partial Summary Judgment

Biller	Date	Description (Motion for Summary Judgment)	Hours
JF	10/7/2016	Begin drafting motion for partial summary judgment.	1.0
JF	10/10/2016	Continue working on summary judgment motion.	7.8
JF	10/11/2016	Work on motion for summary judgment.	0.9
JF	10/12/2016	Work on summary judgment motion and send first draft to Mr. Joseph for review.	2.9
JF	10/13/2016	Call with Mr. Joseph to discuss strategy relating to summary judgment motion.	0.4
PKJ	10/13/2016	Review and edit draft of motion for summary judgment.	1.5
PKJ	10/13/2016	Discuss motion for summary judgment with co-counsel.	0.4
JF	10/14/2016	Work on summary judgment motion.	1.9
PKJ	10/14/2016	Research legislative history regarding nutrient content claims and purpose of preventing consumer deception (Fed. Reg.), and add to motion.	2.2
JF	10/15/2016	Continue working on summary judgment motion, including completing draft of motion, Request for Judicial Notice, and Declaration; send to Mr. Joseph for review and further work as appropriate.	4.5
PKJ	10/16/2016	Draft and edit motion for summary judgment.	1.1
JF	10/17/2016	Work on motion for summary judgment including peripheral papers; call with Mr. Joseph regarding same.	4.6

Biller	Date	Description (Motion for Summary Judgment)	Hours
TMF	10/17/2016	Prepare exhibits for motion for summary judgment; review and revise declaration in support thereof; research regarding images for Refined 15-ounce label that was never produced in discovery.	1.5
TMF	10/17/2016	Prepare addendum of statutes and regulations in support of plaintiff's motion for summary judgment.	1.6
MRP	10/17/2016	Draft administrative motion to file under seal and supporting documents.	0.8
PKJ	10/17/2016	Draft and edit motion for summary judgment.	2.3
PKJ	10/17/2016	Discussing motion for summary judgment with Mr. Fitzgerald.	0.4
PKJ	10/17/2016	Review and edit supporting documents for motion for summary judgment.	0.4
PKJ	10/17/2016	Edit statutory appendix.	0.3
JF	10/18/2016	Finalize and file summary judgment motion including peripheral papers and seal application.	2.8
MRP	10/18/2016	Finish drafting administrative motion to file under seal and supporting documents.	1.8
PKJ	10/18/2016	Review and edit motion for summary judgment.	0.4
PKJ	10/19/2016	Review Mr. Karnik's email regarding one-way intervention rule and research same.	0.8
JF	10/20/2016	Respond to email from Sanjay Karnik regarding motion for summary judgment and insurance; research regarding one-way intervention rule.	0.9
JF	10/21/2016	Prepare and file notice of withdrawal of motion for partial summary judgment.	0.2
Total =			43.4

9. Mediation & Settlement

Biller	Date	Description (Mediation & Settlement)	Hours
PKJ	4/25/2016	Review ADR packet with Preston Jones and submit certification.	0.6
JF	8/12/2016	Telephone call with Rakesh Amin regarding possible settlement; call with Mr. Joseph regarding same.	0.7
PKJ	8/12/2016	Discussing settlement call with co-counsel Mr. Fitzgerald.	0.2
TAC	8/17/2016	Call with Mr. Fitzgerald and Mr. Joseph to strategize regarding Nutiva's settlement demand inquiry.	0.1
JF	8/17/2016	Conference call with Thomas A. Canova and Paul Joseph regarding Nutiva's request for settlement demand.	0.1
PKJ	8/17/2016	Conference call with co-counsel Mr. Fitzgerald and Thomas A. Canova regarding Nutiva's request for a settlement demand.	0.1
JF	10/3/2016	Telephone call with Rakesh Amin regarding settlement; begin drafting settlement offer letter.	0.5
JF	10/25/2016	Review email from Sanjay Karnik regarding meet-and-confer, insurance, and mediation scheduling.	0.1
TAC	10/28/2016	Confer with Mr. Fitzgerald regarding mediation and Nutiva's insurance policy; teleconference with Mr. Fitzgerald and Mr. Joseph regarding settlement strategy; review of Nutiva's letter regarding insurance policy issues; related conferences with Mr. Fitzgerald.	1.0
PKJ	10/28/2016	Call with Mr. Fitzgerald and Mr. Canova regarding mediation, Nutiva's refusal to provide insurance agreement, and other discovery issues.	0.2
JF	11/2/2016	Call Judge Infante's office regarding mediation scheduling and draft email to counsel regarding same.	0.2

Billor	Date	Description (Mediation & Settlement)	Hours
TAC	11/3/2016	Review of Nutiva insurance policies 2012-2017.	0.5
PKJ	11/4/2016	Review Nutiva's insurance policies.	1.3
PKJ	11/7/2016	Research strategies for insurance demands and how to determine whether policies can be aggregated.	1.8
PKJ	11/9/2016	Research insurance issues regarding products' completed operations hazard coverage, applicable limits, non-cumulation provisions, and relevant case law.	1.7
TAC	11/10/2016	Email correspondence with Mr. Fitzgerald and Mr. Joseph regarding Nutiva's insurance coverage; review prior correspondence with insurance company.	0.5
PKJ	11/10/2016	Draft settlement demand letter.	2.0
TAC	11/11/2016	Review <i>Hartford Insurance</i> case decision; related conferences with Mr. Fitzgerald and teleconference with Mr. Joseph regarding strategy for provoking insurance coverage; confer with Mr. Fitzgerald regarding Nutiva's failure to identify a damages model.	0.8
PKJ	11/11/2016	Call with Mr. Fitzgerald and Mr. Canova to discuss insurance.	0.2
PKJ	11/14/2016	Draft insurance demand letter.	2.1
PKJ	11/15/2016	Research insurance coverage provisions and continue to draft insurance demand letter.	5.1
PKJ	11/16/2016	Draft insurance demand letter.	2.2
JF	11/18/2016	Communications with opposing counsel and assistant to mediator Judge Infante (Ret.) regarding mediation scheduling.	0.2
PKJ	11/21/2016	Edit insurance demand letter.	1.1
PKJ	11/21/2016	Review and respond to emails regarding mediation.	0.1

Biller	Date	Description (Mediation & Settlement)	Hours
PKJ	11/28/2016	Draft stipulation and proposed order regarding mediation deadline extension.	0.6
PKJ	11/28/2016	File stipulation and proposed order regarding mediation deadline extension; email proposed order to chambers.	0.4
TAC	11/30/2016	Revisions to draft letter to Liberty Insurance; confer with Ms. Persinger regarding drafting subpoena for same; related email to co-counsel.	2.0
TAC	12/1/2016	Conferences with Mr. Fitzgerald regarding draft insurance letter and subpoena on Liberty Insurance; further conference with Ms. Persinger regarding subpoena; related teleconference with co-counsel.	0.7
PKJ	12/1/2016	Review revisions to insurance demand letter.	0.1
TAC	12/2/2016	Review email from JAMS regarding confirmation of mediation, service list, document retention, and mediation fee; confer with Mr. Fitzgerald regarding draft letter to insurer and proposed subpoena on same; email to co-counsel regarding revising insurer letter; review of co-counsel's redraft, and preparation of additional revisions to draft letter to Nutiva's insurer.	1.9
PKJ	12/2/2016	Revise insurance letter.	1.0
PKJ	12/5/2016	Revise insurance letter.	0.2
JF	12/6/2016	Review, revise, finalize, and serve policy limit demand letter to Liberty Mutual Insurance.	2.7
PKJ	12/16/2016	Draft mediation brief.	1.0
PKJ	12/19/2016	Draft mediation brief.	0.8
PKJ	12/23/2016	Draft mediation brief.	0.4
PKJ	12/26/2016	Draft mediation brief.	3.6
PKJ	12/27/2016	Draft mediation brief.	2.3
JF	1/9/2017	Review letter from insurer to Nutiva.	0.1

Biller	Date	Description (Mediation & Settlement)	Hours
PKJ	1/11/2017	Draft mediation brief.	1.2
PKJ	1/12/2017	Draft mediation brief.	0.2
PKJ	1/15/2017	Draft mediation brief.	3.7
PKJ	1/16/2017	Draft mediation brief.	4.4
PKJ	1/17/2017	Draft mediation brief.	3.8
JF	1/18/2017	Review and revise draft mediation brief.	3.9
PKJ	1/18/2017	Draft mediation brief.	3.2
PKJ	1/23/2017	Revise mediation brief and prepare exhibits.	1.1
JF	1/24/2017	Review and revise latest draft of mediation brief.	1.3
PKJ	1/24/2017	Continue to prepare exhibits for mediation brief.	1.8
PKJ	1/25/2017	Preparing Greger report for use in mediation brief.	0.7
TAC	1/27/2017	Review of draft redacted mediation brief; review content of proposed redactions; related emails and calls with Mr. Joseph.	1.0
TAC	1/31/2017	Confer with Mr. Fitzgerald regarding mediation negotiations, results, and strategy for proceeding.	0.8
JF	1/31/2017	Travel to San Francisco and participate in mediation; travel home.	14.2
PKJ	1/31/2017	Travel to and from mediation, and attend mediation.	14.8
TAC	2/1/2017	Telephone discussion with Mr. Orr regarding mediation, and considerations to pursue settlement; follow up conference with Mr. Fitzgerald; review of Amended Complaint in context of settlement discussion; call to co-counsel regarding settlement issues.	1.0
JF	2/1/2017	Confer with Mr. Joseph and Mr. Canova regarding settlement issues.	0.2
PKJ	2/1/2017	Call with co-counsel regarding settlement discussions and strategy.	0.2

Biller	Date	Description (Mediation & Settlement)	Hours
TAC	2/8/2017	Communications with Mr. Fitzgerald and Mr. Joseph regarding settlement.	0.1
JF	2/8/2017	Call with Matt Orr regarding settlement; communications with Mr. Canova and Mr. Joseph regarding same.	0.2
PKJ	2/8/2017	Call with Mr. Canova and Mr. Fitzgerald regarding settlement discussions with opposing counsel.	0.1
TAC	2/14/2017	Confer with Mr. Fitzgerald and Mr. Joseph regarding settlement options and strategies.	0.1
JF	2/14/2017	Confer with Mr. Canova and Mr. Joseph regarding settlement.	0.1
PKJ	2/14/2017	Confer with Mr. Fitzgerald and Mr. Canova regarding settlement.	0.1
JF	2/17/2017	Call with Matt Orr regarding settlement.	0.3
Table =			99.7